

REMARKS

Applicant would first like to thank Examiners Daye and Al-Hashemi for the in-person interview conducted on Wednesday, Oct. 18, 2006. An interview such as this is very helpful in advancing prosecution of the patent application and the Applicant is grateful for the examiners' time and attention to this matter. The amendments made by this paper are consistent with the discussions and proposals presented during the interview.

In the latest Office Action, mailed September 14, 2006, all of the pending claims 1-4, 6-11, 13, 15-18, 22 and 23 were considered and rejected.¹

By this paper, each of the independent claims 1, 16, and 22 have been amended and no other claims have been added or cancelled, such that claims 1-23 remain pending, of which claims 1, 16, and 22 are the only independent claims at issue.

As discussed during the interview, the present invention is generally directed towards embodiments for providing an interface enabling an object-oriented application to have access to data held in a data repository in which data is held in a format using schema and schema attributes different than the object format within the application. The method recited in claim 1, for instance, as recited in combination with all the elements recited in the claim, includes providing an interface between an object-oriented application and a data repository where the interface can receive access requests identifying an object class and object properties in a format specific to the application and where the interface can translate the access request into an access command using the syntax and schema of the data repository such that the data repository can service the access request as is particularly pointed out in combination with each of the elements of the claim.

Claim 16 recites a computer program product comprising computer-executable instructions for implementing the method recited in claim 1, and claim 22 recites a corresponding mapping tool useful for implementing a method related to the method of claim 1 for mapping the object format of the application to the schema format of the database.

The combination of art cited against the claims includes Ferguson, Van Huben, and Srinivasan. However, as discussed during the interview, this combination of art fails to teach or suggest the claimed invention. Ferguson, for example, teaches methods and systems which can translate relational database

¹ Claims 1-4, 6-11, 13, and 15-18 were rejected under 35 U.S.C. 103(a) as being unpatentable over Ferguson (U.S. Patent No. 6,016,499) filed July 21, 1997, in view of Van Huben (U.S. Patent No. 6,484,177) filed January 13, 2000, and further in view of Srinivasan (U.S. Patent No. 6,587,856) filed December 7, 1998. Claims 22 and 23 were rejected under 35 U.S.C. 102(b) as being anticipated by Chang (U.S. Patent No. 5,627,979) issued May 6, 1997. Although the prior art status of the cited art is not being challenged at this time, Applicant reserves the right to challenge the prior art status of the cited art at any appropriate time, should it arise. Accordingly, any arguments and amendments made herein should not be construed as acquiescing to any prior art status of the cited art.

statements into executable API sequences that produce an API result.² However, this disclosure of Ferguson is clearly distinct from the claimed invention. Even more particularly, Ferguson's disclosure teaching how database statements may be translated into something compatible with another API is distinct from and contrasted from the present invention's teachings for translating object-oriented application calls into database statements. Van Huben, on the other hand, teaches how information from a relational database may be incorporated into a directory service such as LDAP.³ Finally, Srinivasan teaches methods and systems for representing objects in a relational database.⁴

Srinivasan, and the other cited art fails to read on the claimed invention because, even if objects are represented within a relational database, calls made to the database (as required by Srinivasan) and other art, must still employ the syntax understood by the database in order to access data within the database. Access to the database is one of the problems the present invention overcomes — calls made using the object format of an application are translated into the syntax understood by the database.⁵ Accordingly, for at least these reasons, Applicant respectfully submits that at least claims 1 and 16 are distinguished from the cited combination of art. In particular, and as discussed during the interview, claims 1 and 16 are distinguished from the art inasmuch as the cited combination of art fails to teach or suggest any embodiment that includes providing an interface between an object-oriented application and a data repository where the interface can receive access requests identifying an object class and object properties in a format specific to the application and where the interface can translate the access request into an access command using the syntax and schema of the data repository, and such that the data repository can service the access request, and as recited in combination with the other recited claim elements.

The only other independent claim, claim 22, was rejected in view of Chang. However, the mapping tool recited in amended claim 22 is neither anticipated by, nor made obvious by the disclosure of Chang.⁶ In particular, Chang fails to teach or suggest any sort of mapping tool that is configured for 'inserting metadata within a definition of the selected object class, wherein the metadata associates the selected object property with the selected schema attribute, and particularly as recited in combination with the other recited claim elements.'⁷ Because Chang does not teach each and every element of the present

² See, generally, Ferguson, U.S. Patent No. 6,016,499 (filed Jul. 21, 1997).

³ See, generally, Van Huben et al., U.S. Patent No. 6,484,177 (filed Jan. 13, 2000).

⁴ See, generally, Srinivasan et al., U.S. Patent No. 6,587,856 B1 (filed Dec. 7, 1998).

⁵ An apt analogy applies to the distinction between Srinivasan and the present invention: If a key to a locked box is inside the box, then that key cannot be used to unlock the box. Because the objects in Srinivasan are inside the database, there is no way for them to be used by the application of the present invention which is outside the database and does not understand the syntax of the database.

⁶ Support for the amendments to Claim 22 are found in at least ¶¶ 55–58 and Fig's 8A & 8B.

⁷ See, Chang et al., U.S. Patent No. 5,627,979 col.14 l.30–65 (filed Jul. 18, 1994); see also, generally, Chang.

invention, a rejection under 35 U.S.C. 102 would be inappropriate. Correspondingly, Applicant respectfully requests the rejection of claim 22 now be withdrawn.

The foregoing claims and amendments were discussed in the interview of Oct. 18, 2006, and were generally found to further clarify the claimed invention and to further distinguish the claimed invention from the cited art of record.

In view of the foregoing, Applicant respectfully submits that the other rejections to the claims are now moot and do not, therefore, need to be addressed individually at this time.⁸

In the event that the Examiner finds remaining impediment to a prompt allowance of this application that may be clarified through a telephone interview, the Examiner is requested to contact the undersigned attorney.

Dated this 31st day of October, 2006.

Respectfully submitted,



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⁸ It will be appreciated, however, that this should not be construed as Applicant acquiescing to any of the purported teachings or assertions made in the last action regarding the cited art or the pending application, including any official notice. Instead, Applicant reserves the right to challenge any of the purported teachings or assertions made in the last action at any appropriate time in the future, should the need arise. Furthermore, to the extent that the Examiner has relied on any Official Notice, explicitly or implicitly, Applicant specifically requests that the Examiner provide references supporting the teachings officially noticed, as well as the required motivation or suggestion to combine the relied upon notice with the other art of record.